

EXHIBIT 19

HIGHLY CONFIDENTIAL

Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

5 IN RE GOOGLE PLAY STORE)
6 ANTITRUST LITIGATION)
7 THIS DOCUMENT RELATES TO:) CASE NO.
8 STATE OF UTAH, ET AL. V.) 3:21-MD-02981-JD
9 GOOGLE, LLC, ET AL.,)
10 CASE NO. 3:21-CV-05227-JD)
11)
12 MATCH GROUP, LLC ET AL. V.)
13 GOOGLE, LLC ET AL.,)
14 CASE NO. 3:22-CV-02746-JD)
15)
16 EPIC GAMES, INC. V. GOOGLE,)
17 LLC ET AL.,)
18 CASE NO. 3:20-CV-05671-JD)
19)
20 IN RE GOOGLE PLAY CONSUMER)
21 ANTITRUST LITIGATION,)
22 CASE NO. 3:20-CV-05761-JD)
23)

** PROVISIONALLY HIGHLY CONFIDENTIAL **

PROCEEDINGS OF
VIDEOTAPED DEPOSITION OF STEVEN SCHWARTZ, PH.D.
TUESDAY, MARCH 28, 2023

24 REPORTED BY: REAGAN EVANS, RPR, RMR, CRR, CCRR,
25 CLR, CRC, CA CSR NO. 8176

HIGHLY CONFIDENTIAL

Page 11

1 plaintiff governments.

2 THE VIDEOGRAPHER: Would any of our remote
3 participants care to state their appearances on the
4 record today?

5 Hearing nothing, would the court reporter
6 please swear in the witness, and then Counsel may
7 proceed?

8 STEVEN SCHWARTZ, Ph.D.,
9 having been first duly sworn by the reporter,
10 was examined and testified as follows:

11
12 THE WITNESS: I do.

13 THE REPORTER: Thank you.

14
15 EXAMINATION

16 BY MR. RAPHAEL:

17 Q Good morning, Dr. Schwartz.

18 A Good morning.

19 Q Could you state your name for the record.

20 A Steven Schwartz.

21 Q And have you been deposed a number of
22 times, Dr. Schwartz?

23 A I have.

24 Q About how many times?

25 A Certainly north of 30. Whether it's north

HIGHLY CONFIDENTIAL

Page 24

1 Q Okay.

2 Did you -- strike that.

3 Were you offered any academic positions
4 after you thought about leaving Miami University?

5 MR. PURPURA: Objection. Form.

6 THE WITNESS: That's a long time ago.

7 My recollection is that at the time that I
8 accepted the job at NERA, I had accepted three or
9 four invitations to visit campus for different
10 academic positions and to present seminars.

11 When the NERA offer came, I accepted it,
12 and I obviously cancelled those invitations.

13 BY MR. RAPHAEL:

14 Q Okay.

15 Have you ever published any paper in any
16 peer-reviewed journal?

17 A I have.

18 Q Okay.

19 How many?

20 A I don't have an exact number in mind.
21 Somewhere between five and ten.

22 Q Okay.

23 Now, I've previously marked as
24 Exhibits 1106, 1107, and 1108 your reports that you
25 submitted in this matter.

HIGHLY CONFIDENTIAL

Page 25

1 (Whereupon Schwartz Exhibit 1106
2 was marked for identification and
3 attached hereto.)

4 (Whereupon Schwartz Exhibit 1107
5 was marked for identification and
6 attached hereto.)

7 (Whereupon Schwartz Exhibit 1108
8 was marked for identification and
9 attached hereto.)

10 MR. RAPHAEL: For the record, 1106 is your
11 opening report.

1107 is your rebuttal report.

13 And 1108 is your reply report.

14 BY MR. RAPHAEL:

15 Q I see you've got paper copies of those next
16 to you, and I understand from Counsel that those are
17 clean without any notes; is that right?

18 MR. HARSHBARGER: That's correct.

19 BY MR. RAPHAEL:

20 Q Okay.

21 So you should feel free to consult those if
22 it's easier than on the screen. I'm totally fine
23 with that.

24 A Okay. Thank you.

25 O Who wrote the reports that you submitted in

HIGHLY CONFIDENTIAL

Page 26

1 this matter, Dr. Schwartz?

2 MR. PURPURA: Objection. Form.

3 THE WITNESS: In the end, I am responsible
4 for everything that was written either because I
5 wrote it myself, edited it myself, or reviewed what
6 was written, but I did not -- if -- I did not write
7 every word that is in any of these or all of these
8 reports.

9 BY MR. RAPHAEL:

10 Q Can you give me an estimate of about how --
11 what portion of your report you personally wrote
12 yourself.

13 A My staff would tell you that I rewrote or
14 edited probably everything.

15 In terms of portions of the report where I
16 took the lead in writing, probably a quarter where I
17 took the lead where I would have written the
18 original draft. Probably the remaining 75 percent,
19 an initial draft was written by someone else
20 pursuant to an outline that I had prepared.

21 Q Okay.

22 And in writing your reports, you used your
23 words carefully?

24 A Yes.

25 Q And you have been an expert a number of

HIGHLY CONFIDENTIAL

Page 316

1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) ss.
3

4 I, Reagan Evans, RPR, RMR, CRR, CCRR, CLR, CRC,
5 CSR No. 8176, in and for the State of California, do
6 hereby certify:

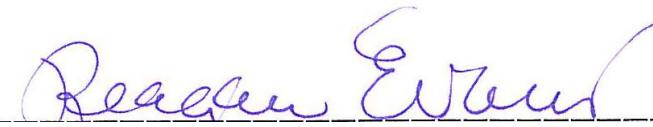
7 That prior to being examined, the witness named
8 in the foregoing deposition was by me duly sworn to
9 testify to the truth, the whole truth, and nothing
10 but the truth;

11 That said remote deposition was taken down by me
12 in shorthand at the time and place therein named and
13 thereafter reduced to typewriting under my
14 direction, and the same is a true, correct, and
15 complete transcript of said proceedings;

16 That if the foregoing pertains to the original
17 transcript of a deposition in a federal case, before
18 completion of the proceedings, review of the
19 transcript {xx} was { } was not required.

20 I further certify that I am not interested in
21 the event of the action.

22 Witness my hand this 28th day of March, 2023.

23 
24

25 Certified Shorthand Reporter
for the State of California